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6 July 2017

**VIA US MAIL**

Regional Freedom of Information Officer  
U.S. EPA Region 4  
AFC Bldg  
61 Forsyth Street S.W., 9<sup>th</sup> Floor  
Atlanta, GA 30303-8960

Re: Rosa Ann Menafee, etc. v. John Crane Inc.  
Circuit Court of Lee County, AL  
CV-2016-900420

Dear Sir or Madam:

This firm represents Defendant John Crane Inc. in the above-referenced case. A copy of a subpoena which will be served upon you at the request of Plaintiff's counsel is enclosed. Under the Alabama Rules of Civil Procedure, we have a right to receive copies of documents produced to any other party in response to a subpoena. Therefore, please send me copies of any documents produced to Plaintiff's attorney in response to the subpoena. We will reimburse you with any reasonable costs incurred in connection with this request.

Please give us a call if you have any questions.

Sincerely,

HUIE, FERNAMBUCQ & STEWART, LLP

*Frank E. Lankford, Jr.*

By: Frank E. Lankford, Jr.  
FEL/tc  
Enclosure



ELECTRONICALLY FILED  
6/29/2017 3:59 PM  
43-CV-2016-900420.00  
CIRCUIT COURT OF  
LEE COUNTY, ALABAMA  
MARY B. ROBERSON, CLERK

**IN THE CIRCUIT COURT OF LEE COUNTY, ALABAMA**

**ROSA ANN MENAFEE, Individually )  
AND AS PERSONAL REPRESENTATIVE )  
OF THE ESTATE OF CORNELL )  
MENAFEE, deceased, )**

**Plaintiff, )**

**v. )**

**Civil Action No.:**

**43-CV-2016-900420**

**CERTAINTIED CORPORATION; Et al. )**

**Defendants. )**

**NOTICE OF INTENT TO SERVE SUBPOENA ON NON-PARTY**

Take notice that upon the expiration of fifteen (15) days from the date of service of this notice Plaintiff, Rosa Ann Menafee will apply to the Clerk of this Court for issuance of the attached subpoena directed to Regional Freedom of Information Officer, U.S. EPA, Region 4, who is not a party and whose address is AFC Bldg, 61 Forsyth Street., S.W., 9th Flr (4PM/IF), Atlanta, GA 30303-8960, to produce the documents and things at the time and place specified in the subpoena.

**/s/ Thomas J. Knight**

Thomas J. Knight

Attorney for Plaintiffs

HUBBARD & KNIGHT

1125 Noble Street

Anniston, Alabama 36201

Phone: 256-237-9586

Facsimile: 256-237-9594

Email: [hubbardknight@msn.com](mailto:hubbardknight@msn.com)

**/s/ Steve R. Morris**

Steve R. Morris

Attorney for Plaintiff

Steve Morris Law  
P.O. Box 814  
Wedowee, Alabama 36278  
Phone: (256) 357-9222  
Facsimile: 256-237-9594  
Email: [stevemorrislaw@yahoo.com](mailto:stevemorrislaw@yahoo.com)

/s/ Ben Hand  
Ben Hand(HAN035)  
Attorney for Plaintiff

Hand & Associates  
114 N 8th St  
Opelika, AL 36801-4334  
Phone: (334) 741-4077  
Facsimile: (334) 741-4074  
Email: [LLCben@handlawfirm.com](mailto:LLCben@handlawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2017, I electronically filed the foregoing with the clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record in this case.

/s/ Thomas J. Knight  
Thomas J. Knight  
Attorney for Plaintiff

## IN THE CIRCUIT COURT OF LEE COUNTY, ALABAMA

ROSA ANN MENAFEE, Individually	)	
AND AS PERSONAL REPRESENTATIVE	)	
OF THE ESTATE OF CORNELL	)	
MENAFEE, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.:
	)	43-CV-2016-900420
	)	
CERTAINTIED CORPORATION; Et al.	)	
	)	
Defendants.	)	

**CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS, ETC., UNDER**  
**RULE 45**

**TO: Regional Freedom of Information Officer**  
**U.S. EPA, Region 4**  
**AFC Bldg, 61 Forsyth Street., S.W., 9th Flr (4PM/IF)**  
**Atlanta, GA 30303-8960**

You are hereby commanded to do each of the following acts at the instance of the Plaintiff Rosa Ann Menafee, within fifteen(15) days after service of this subpoena:

1. That you produce the and permit this Plaintiff to inspect and to copy each of the following documents:
  - All documents, records, inspections, communications with, or regarding, photographs, videos, check lists, compliance data, or other material related to asbestos at the Uniroyal Plant located in Opelika, AL.
  - Particular copies and copying may be discussed with the attorney at 256-237-9586.

Such production and inspection is to take place at the place where the documents or things requested are regularly kept or at some other reasonable place designated by you.

You are further advised that other parties to this action in which this subpoena has been issued have the right to be present at the time of such production or

inspection.

You have the option to deliver or mail legible copies of documents or things to the party causing the issuance of this subpoena, but you may condition such activity on your part upon the payment in advance by the party causing the issuance of this subpoena and stating, with respect to any item or category to which objection is made, your reasons for such objection.

DATED: \_\_\_\_\_

\_\_\_\_\_  
CIRCUIT CLERK

and / or

\_\_\_\_\_  
DEPUTY CLERK

PLEASE MAIL COPIES TO:

Thomas J. Knight  
HUBBARD & KNIGHT  
1125 Noble Street  
Anniston, Alabama 36202